



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 13 2011

REPLY TO THE ATTENTION OF:

E-19J

Diana Olinger
National Oceanic and Atmospheric Administration
Office of Ocean and Coastal Resource Management
1305 East-West Highway, N/ORM 3
Silver Spring, Maryland 20910

**RE: Draft Environmental Impact Statement for the Illinois Coastal Management Program
(CEQ # 20110312)**

Dear Ms. Olinger:

The U.S. Environmental Protection Agency has received National Oceanic and Atmospheric Administration (NOAA) correspondence dated September 6, 2011, requesting EPA's review of and comments on the Draft Environmental Impact Statement (EIS) for the proposed Illinois Coastal Management Program (ICMP). ICMP goals include preserving, protecting, restoring, and where possible, enhancing coastal resources through coordination among local, state, and Federal agencies and organizations, and leveraging ICMP resources and other funds to maximize the impact of local projects.

EPA has reviewed the Draft EIS for the aforementioned project. This letter provides our comments on the Draft EIS, pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The Draft EIS presents proposed actions by NOAA's Office of Ocean and Coastal Resource Management (OCRM) to approve the Illinois Coastal Management Program. Specifically, the State of Illinois has submitted a coastal management program for approval by NOAA's OCRM, pursuant to Section 306 of the Coastal Zone Management Act (CZMA) of 1972, as amended (16 USC 1451). The proposed federal action is OCRM's approval of the ICMP. The alternatives proposed in the DEIS include approval of the ICMP (OCRM's preferred alternative), the "no action" alternative where OCRM takes no action or denies approval of the ICMP, and a third alternative where OCRM delays Federal approval of the ICMP.

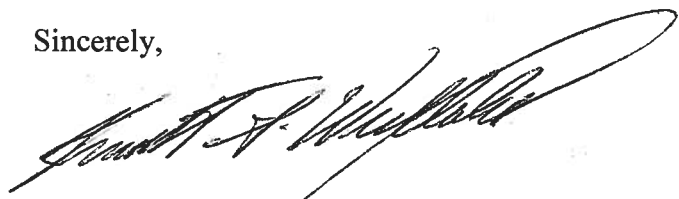
The purpose of OCRM's approval of the ICMP would be to allow the State of Illinois to (1) receive federal funds under the CZMA to implement its Federally-approved program; and (2) conduct federal consistency reviews based on its Federally-approved State enforceable policies. Illinois is the last of the 35 coastal states to apply for the federal Coastal Zone Management Program.

The Draft EIS states that implementation of the preferred alternative (approval of the ICMP) would result in primarily beneficial environmental, institutional, and socio-economic effects. Specifically, ICMP implementation would allow for improved regulation and enforcement, balanced coastal community development, improved economic development for water-dependent uses, better natural resource and hazardous-areas management, improved intergovernmental coordination, and greater public awareness of coastal management issues.

Based on our review of this document, EPA has assigned this Draft EIS a rating of "**Lack of Objections**" (LO). At this time, we have no substantive comments on the proposed action. A summary of the rating system used in EPA's evaluation of the document is enclosed with this correspondence.

Thank you for the opportunity to review and comment on this Draft EIS. Please send us future NEPA documents on this project as they become available. If you have any questions about this letter, please contact Ms. Liz Pelloso, PWS, of my staff at 312-886-7425, or via email at pelloso.elizabeth@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth A. Westlake", with a large, sweeping loop at the end.

Kenneth A. Westlake, Chief
NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Enclosure

cc: Todd Main, Illinois Department of Natural Resources (w/enclosure)

SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1-Adequate

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment